

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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2006 MAR 10 P 12:50

Bienvenido I. Lugo-Marchant

Plaintiff,

v.

**Peter Tsickritzis, Kevin Kingston,
and United Liquors Limited et al.,**

Defendants

U.S. DISTRICT COURT
DISTRICT OF MASS.
Civil Action
No. 05 11317 NMG

ANSWER TO INTERROGATORIES

1. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information already available.
2. Objection. This interrogatory seeks information this party intends to offer at trial.
3. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information equally available to the propounding party.
4. At this time, no one.
5. Objection. Vague, ambiguous and unintelligible.
6. Objection. Asked and answered.
7. Some of the instruction was held out of state, other in MA. Some of the courses cover a greater period of time. Demand for disclosure is premature.
8. Objection. Overbroad and unduly burdensome in that no number is specified. This interrogatory covers a number of hypothetical individuals.
9. Objection. Oppressive, this interrogatory calls for a professional opinion from a lay person.
10. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information equally available to the propounding party.
11. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information already available to the propounding party.

12. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information already available to the propounding party.
13. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information equally available to the propounding party.
14. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information equally available to the propounding party.
15. Objection. Oppressive, harassing and burdensome. This interrogatory seeks information equally available to the propounding party.

DOCUMENTS REQUEST

1. Objection. Asked and answered, already submitted to MCAD/eeoc.
2. Objection. Asked and answered, already submitted to MCAD/eeoc.
3. Objection. Asked and answered, already submitted to MCAD/eeoc.
4. Objection. Asked and answered, already submitted to MCAD/eeoc.
5. Objection. Asked and answered, already submitted to MCAD/eeoc.
6. Objection. Asked and answered, already submitted to MCAD/eeoc.
7. Objection. Asked and answered, already submitted to MCAD/eeoc.
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11. Objection. Asked and answered, already submitted to MCAD/eeoc.
12. Objection. Asked and answered, already submitted to MCAD/eeoc.

13. Objection. Asked and answered, already submitted to MCAD/eeoc.
14. Objection. Asked and answered, already submitted to MCAD/eeoc.
15. Objection. Irrelevant and burdensome.
16. Objection. Irrelevant and burdensome.
17. Objection. Vague, ambiguous and unintelligible.
18. Objection. Asked and answered.
19. Objection. Asked and answered
20. Objection. Oppressive and burdensome.
21. Objection. The employer has such records.
22. Objection. Oppressive and burdensome.
23. Objection. Asked and answered.
24. Objection. Oppressive and burdensome.
25. Objection. Premature and burdensome.
26. Objection. Asked and answered.
27. Objection. Irrelevant and burdensome.
28. Objection. Oppressive and burdensome.

This is answered to the best of my abilities and knowledge.

Bienvenido Lugo
19 Grove Street
Brockton, MA 02301

Pro se , forma pauperis

A handwritten signature in black ink, appearing to read 'B. Lugo', with a long horizontal flourish extending to the right.

March 9-2006